

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

United States of America,

Plaintiff,

Case No. 20-cr-20491

v.

Hon. Thomas L. Ludington

Justin William Zube,

Defendant.

**United States' Notice of Intent to Introduce Evidence
under Federal Rule of Evidence 414**

The United States gives notice to the defendant, under Federal Rule of Evidence 414, that it intends to introduce evidence that the defendant committed other acts of child molestation, as that term is defined in Fed. R. Evid. 414(d)(2)(B) (“any conduct prohibited by U.S.C. chapter 110”).

Specifically, the United States intends to introduce evidence regarding the defendant’s 2014 conviction in Bay County Circuit Court, Case No. 14-010179-FH, for possession of child sexually abusive

material, in violation of Mich. Comp. Laws § 750.145c, and the conduct involved in that conviction.

Statements of the witnesses as contained and summarized in the police reports regarding the defendant's conduct, including a copy of the charging document, judgment, transcripts, or other court documents, have been or will be provided in discovery.

Respectfully Submitted,

Saima S. Mohsin
Acting United States Attorney

/s/ William J. Vaillencourt, Jr.
William J. Vaillencourt, Jr. (P39115)
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Dated: September 28, 2021

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following: All counsel of record.

/s/ William J. Vaillencourt, Jr.
William J. Vaillencourt, Jr. (P39115)
Assistant United States Attorney